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**Pro Hac Vice*

Attorneys for Plaintiff and the Classes

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

**ABANTE ROOTER AND PLUMBING,
INC., individually and on behalf of all others
similarly situated,**

Plaintiff,

V.

**UNLOCKED BUSINESS STRATEGIES,
INC.** a New York corporation, **THOMAS R.
COSTA**, an individual, and **MERCHANT
INDUSTRY, LLC d/b/a SWIPE4FREE**, a
New York limited liability company,

Defendants.

Case No. 4:19-cv-07966-JST

NOTICE OF SETTLEMENT

Judge: Hon. Jon S. Tigar

Plaintiff Abante Rooter and Plumbing, Inc. (“Plaintiff” or “Abante”) hereby provides notice that the Plaintiff and Merchant Industry, LLC d/b/a Swipe4Free (“Defendant” or “Merchant Industry”) have reached a settlement in this case and states as follows:

- Plaintiff filed the instant case alleging violations of the Telephone Consumer Protection Act, 47 U.S.C. § 227, *et seq.* (“TCPA”). (See Dkt. 1.)

2. Plaintiff and Merchant Industry have engaged in settlement discussions and have reached an agreement to resolve Plaintiff's claims asserted against Merchant Industry.
 3. Plaintiff's claims against Defendants Unlocked Business Strategies, Inc. and Thomas R. Costa shall remain.

Plaintiff and Merchant Industry are presently working to finalize a settlement agreement and believe a Stipulation of Dismissal will be filed within thirty (30) days.

Date: March 10, 2021

ABANTE ROOTER AND PLUMBING, INC.,
individually and on behalf of all others similarly
situated,

By: /s/ Taylor T. Smith
One of Plaintiff's Attorneys

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above titled document was served upon counsel of record by filing such papers via the Court's ECF system on March 10, 2021.

/s/ Taylor T. Smith